

1 **STP**  
2 **MICHAEL D. PARIENTE, ESQ.**  
Nevada Bar No. 9469  
3 **PARIENTE LAW FIRM, P.C.,**  
4 **JOHN G. WATKINS, OF COUNSEL**  
1635 Village Center Circle, Suite 280  
Las Vegas, Nevada 89169  
5 (702) 966-5310, (F) (702) 474-4210  
6 Email: michael@parientelaw.com  
Attorney for Defendant  
7 **ROSS LESLIE SWIFT**

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,	)	Case No.: 2:25-cr-00030-RFB-DJA
	)	
11 Plaintiff,	)	
	)	<b>STIPULATION TO CONTINUE</b>
12 vs.	)	<b>SENTENCING</b>
	)	
13 ROSS LESLIE SWIFT,	)	
	)	
14 Defendant	)	
	)	
15	)	

16 IT IS HEREBY STIPULATED AND AGREED, by and between SEAN P. SULLIVAN,  
17 ESQ., and MICHAEL D. PARIENTE, ESQ. and Plaintiff UNITED STATES OF AMERICA, by  
18 and through AUSA Kimberly Frayn, counsel for the Government, and submits this stipulation to  
19 continue Defendant's sentencing date.

20 The parties request that the sentencing date of June 10, 2025 be vacated and continued to  
21 a date and time convenient to this Court, but not sooner than 60 days from June 10, 2025.

22 This stipulation is entered into for the following reasons:

- 23 1. The Defendant needs additional time to continue working with various governmental  
24 officials to obtain identification in his real name.
- 25 2. The Defendant and the Government agree to the continuance.
- 26 3. Defendant is not in custody.
- 27

- 1 4. Denial of this request for a continuance could result in a miscarriage of justice.
- 2 5. Defense Counsel Pariente is out of the country and will not be available until the
- 3 week of June 16, 2025.
- 4

5 DATED this 3<sup>rd</sup> day of June, 2025.

6 **KIMBERLY FRAYN**

**SEAN P. SULLIVAN, CHTD.**

7

8 /s/Kimberly Frayn  
9 KIMBERLY FRAYN  
Assistant United States Attorney

/s/ Sean P. Sullivan  
SEAN P. SULLIVAN, ESQ.  
Nevada Bar No.: 4768

10 **PARIENTE LAW FIRM, P.C.**

11 /s/ Michael D. Pariente  
12 MICHAEL PARIENTE, ESQ.  
13 Nevada Bar No.: 9469

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**ORD**

THE PARIENTE LAW FIRM, P.C.  
MICHAEL D. PARIENTE, ESQ.  
Nevada Bar No.009469  
JOHN G. WATKINS, OF COUNSEL  
1635 Village Center Cir., Suite 280  
Las Vegas, Nevada 89134  
(702) 966-5310

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,	)	Case No.: 2:25-cr-00030-RFB-DJA
	)	
Plaintiff,	)	
	)	<b>STIPULATION TO CONTINUE</b>
vs.	)	<b>SENTENCING</b>
	)	
ROSS LESLIE SWIFT,	)	
	)	
Defendant.	)	
	)	
	)	

**FINDINGS OF FACT**

Based on the pending stipulation of counsel, and good cause appearing therefore, the Court finds:

1. The Defendant needs additional time to continue working with various governmental officials to obtain identification in his real name.
2. The Defendant and the Government agree to the continuance.
3. Defendant is not in custody.
4. Denial of this request for a continuance could result in a miscarriage of justice.
5. Defense Counsel Pariente is out of the country and will not be available until the week of

**CONCLUSIONS OF LAW**

For all of the above-stated reasons, the ends of justice would be served by vacating the sentencing date scheduled for June 10, 2025.

**ORDER**

**IT IS ORDERED** that the sentencing hearing date presently set be vacated, continued and reset for September 9, 2025 at 12:15 p.m.

DATED this 4th day of June, 2025.

A handwritten signature in black ink, appearing to be 'RFB', written over a horizontal line.

THE HONORABLE RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT COURT JUDGE

**CERTIFICATE OF SERVICE**

On June 3, 2025 the undersigned caused a true and correct copy of the aforementioned  
**DEFENDANT’S SENTENCING MEMORANDUM** via the ECF system.

**PARIENTE LAW FIRM, P.C.**

/s/ Michael D. Pariente  
MICHAEL PARIENTE, ESQ.  
Nevada Bar No.: 9469